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Attorneys for Defendants, Counterclaimants, and
Third Party Plaintiffs PCJV USA, LLC, PCI
TRADING LLC, POTATO CORNER, LA
GROUP, LLC, GK CAPITAL GROUP, LLC,
NKM CAPITAL GROUP, LLC and GUY
KOREN, and Defendants J & K AMERICANA,
LLC, J&K LAKEWOOD, LLC, J&K
OAKRIDGE, LLC, J&K VALLEY FAIR, LLC, J
& K ONTARIO, LLC, J&K PC TRUCKS, LLC,
HLK MILPITAS, LLC, and GK CERRITOS, LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SHAKEY'S PIZZA ASIA VENTURES,
INC, a Philippines corporation,

Plaintiff,

vs.

PCJV USA, LLC, a Delaware limited
liability company; PCI TRADING , LLC, a
Delaware limited liability company; GUY
KOREN, an individual; POTATO CORNER
LA GROUP, LLC, a California limited
liability company; NKM CAPITAL GROUP,
LLC, a California limited liability company;
J & K AMERICANA, LLC, a California
limited liability company; J&K
LAKEWOOD, LLC, a California limited
liability company; J&K VALLEY FAIR,
LLC, a California limited liability company;
J & K ONTARIO, LLC, a California limited
liability company; HLK MILPITAS, LLC, a
California, limited liability company; GK
CERRITOS, LLC, a California, limited
liability company; J&K PC TRUCKS, LLC,
a California limited liability company; and,
GK CAPITAL GROUP, LLC, a California

Case No. 2:24-CV-04546-SB(AGRx)

Hon. Stanley Blumenfeld, Jr.

**DEFENDANTS' APPENDIX OF
EVIDENCE IN SUPPORT OF
THEIR MOTION FOR
SUMMARY JUDGMENT**

Complaint Filed: May 31, 2024
Trial Date: September 26,
2025

limited liability company and DOES 1 through 100, inclusive,

Defendants.

PCJV USA, LLC, a Delaware limited liability company; PCI TRADING LLC, a Delaware limited liability company; POTATO CORNER LA GROUP LLC, a California limited liability company; GK CAPITAL GROUP, LLC, a California limited liability company; NKM CAPITAL GROUP LLC, a California limited liability company; and GUY KOREN, an individual,

Counter-Claimants,

v.

SHAKEY'S PIZZA ASIA VENTURES, INC, a Philippines corporation,

Counter Defendant.

PCJV USA, LLC, a Delaware limited liability company; PCI TRADING LLC, a Delaware limited liability company; POTATO CORNER LA GROUP LLC, a California limited liability company; GK CAPITAL GROUP, LLC, a California limited liability company; NKM CAPITAL GROUP LLC, a California limited liability company; and GUY KOREN, an individual,

Third Party Plaintiffs,

v.

PC INTERNATIONAL PTE LTD., a Singapore business entity; SPAVI INTERNATIONAL USA, INC., a California corporation; CINCO CORPORATION, a Philippines corporation; and ROES 1 through 10, inclusive,

Third Party Defendants.

TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Defendants PCJV USA, LLC, PCI Trading, LLC, Guy Koren, Potato Corner LA Group, LLC, NKM Capital Group, LLC, J & K Americana, LLC, J&K Lakewood, LLC, J&K Oakridge, LLC, J&K Valley Fair, LLC, J & K Ontario, LLC, J&K PC Trucks, LLC, HLK Milpitas, LLC, GK Cerritos, LLC, and GK Capital Group, LLC (collectively, “Defendants”) hereby submit this Appendix of Evidence in support of their Motion for Summary Judgment.

Exhibit	Description
“A”	Stipulated Facts. Dkt. 257.
Trial Exhibit No. (“TE”) 1	USPTO Service Mark Registration – logo mark
TE 3	USPTO Service Mark Registration – word mark
TE 5	USPTO Service Mark Registration – slogan mark
TE 62	Limited Liability Company Agreement of PCJV USA, LLC
TE 75	January 2011 emails with DLA Piper
TE 1010	April 20, 2010 Draft Joint Venture Agreement
TE 1019	May 30, 2010 Partnership Meeting Minutes
TE 1020	June 1, 2010 Draft Joint Venture Agreement
TE 1023	June 11, 2010 Draft Joint Venture Agreement
TE 1025	June 28, 2010 Draft Joint Venture Agreement
TE 1028	September 16, 2010 Draft Joint Venture Agreement
TE 1032	January 2011 emails with DLA Piper
TE 1034	February 7, 2011 Franchise Disclosure Documents
TE 1038	DLA Piper billing records
TE 1039	DLA Piper billing records

1	TE 1040	DLA Piper billing records
2	TE 1041	DLA Piper billing records
3	TE 1045	June 18, 2012 Master Services Agreement
4	TE 1050	Executed Joint Venture Agreement
5	TE 1052	October 2012 Board Meeting Minutes
6	TE 1053	First Amendment to Joint Venture Agreement
7	TE 1076	Verified Complaint (<i>Cinco Corporation v. Koren</i> , LASC Case No. BC701075, April 10, 2018)
9	TE 1077	Verified First Amended Complaint (<i>Cinco</i> <i>Corporation v. Koren</i> , LASC Case No. BC701075, August 24, 2018)
12	TE 1078	Verified Second Amended Complaint (<i>Cinco</i> <i>Corporation v. Koren</i> , LASC Case No. BC701075, December 18, 2018)
15	TE 1079	Verified Third Amended Complaint (<i>Cinco</i> <i>Corporation v. Koren</i> , LASC Case No. BC701075, June 28, 2019)
18	TE 1084	Declaration of Jose P. Magsaysay, Jr., May 15, 2019
20	TE 1086	Declaration of Jose P. Magsaysay, Jr., December 18, 2018
22	TE 1096	July 2, 2010 Draft Joint Venture Agreement
23	TE 1154	Plaintiff's November 22, 2024 letter to PCJV's Franchisees
25	TE 1172	Settlement and Release Agreement; Membership Interest Purchase Agreement (with assignments)
27	TE 1184	April 19, 2018 Franchise Disclosure Documents

TE 1239	February 7, 2024 Franchise Agreement
TE 1248	September 12, 2024 Franchise Agreement
TE 1257	California Department of Business Oversight Stipulation, Citation, and Desist and Refrain Order
TE 1413	Declaration of Guy Koren and Related Filings, specifically Exhibit C: Verified Complaint (<i>PCJV USA, LLC v. Koren, et al.</i> , LASC Case No. BC705580, May 8, 2018)

DATED: September 24, 2025 **BLANK ROME LLP**

By: */s/ Arash Beral*

Todd M. Malynn

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Jamison T. Gilmore

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and Third Party Plaintiffs PCJV USA, LLC,
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AMERICANA, LLC, J&K LAKEWOOD,
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MILPITAS, LLC, and GK CERRITOS, LLC